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August 1, 2019

BY ECF FILING

Hon. Debra Freeman United States Magistrate Judge Daniel Patrick Moynihan United States Courthouse 500 Pearl Street, Courtroom 17A New York, New York 10007-1312

Re: Dhaliwal v. HYPR Corp. and

George Avetisov, 17 Civ. 7959 (GBD) (DCF)

Dear Magistrate Judge Freeman:

We represent plaintiff Amarpreet Dhaliwal in the above-referenced matter. We submit this letter jointly along with counsel for defendants.

The parties have now completed the discovery that remained following this Court's rulings on the parties' respective motions to compel. The next step is for the parties to complete the Joint Pretrial Order called for in Judge Daniels' Individual Practices. To accommodate counsels' work and differing summer vacation schedules, the parties respectfully request that the deadline for the parties to file the Joint Pretrial Order be September 18, 2019.

Thank you very much for your consideration of this matter.

Respectfully submitted,

/s/ Gerry Silver

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cc: Jonathan Bach, Esq. Jacob Wolf, Esq.